STATE OF CONNECTICUT CONNECTICUT SITING COUNCIL

Petition of BNE Energy Inc. for a Declaratory Ruling for the Location, Construction and Operation of a 4.8 MW Wind Renewable Generating Project on Flagg Hill Road in Colebrook, Connecticut ("Wind Colebrook South") Petition No. 983

March 15, 2011

PETITIONER BNE ENERGY INC.'S INTERROGATORY RESPONSES TO THE TOWN OF COLEBROOK'S FIRST SET OF INTERROGATORIES

Petitioner BNE Energy Inc. ("BNE") submits the following response to the Town of Colebrook's First Set of Interrogatories dated March 7, 2011:

- Q1. In selecting the GE 1.6 MW Wind Turbines proposed for this site, did you consider turbines with towers shorter than 100 meters, or turbines having rotor blades which are shorter in length than 40.3 meters in length?
- A1. Yes, BNE considered numerous turbine manufacturers and turbine sizes in analyzing the site layout and design to appropriately balance wind energy production while providing for proper setbacks and minimizing environmental impacts. GE's 1.6—82.5 MW wind turbine at a 100 meter hub height was selected by BNE after extensive study as the most appropriate wind turbine model for the Site. GE is a Connecticut based company and one of the world's leading wind turbine suppliers with more than 15,000 GE wind turbine installations operating worldwide to provide clean renewable energy. The proposed unit is one of the world's most widely-used wind turbines in its class with operation in 19 countries, 170+ million operating hours and 100,000+ gigawatt-hours (GWh) produced. See BNE's petition. See also the Wind Assessment conducted by Electric Power Engineers dated April 12, 2010 and filed as an Attachment to Noise Impact Analysis filed as Exhibit M to BNE's Petition. See also BNE's response to Siting Council interrogatories Q14 dated February 24, 2011.
- Q2. If the answer to question 1 is in the affirmative, please describe all wind turbines so considered and describe why such turbines were not selected instead of the GE 1.6 MW Wind Turbines.
 - **A2.** See response to interrogatory #1.
- Q3. How would the use of a wind turbine having a tower shorter than 100 meters and/or rotor blades shorter than 40.3 meters in length affect potential visibility of the wind turbine facilities both during "leaf-on" conditions and "leaf-off" conditions?

- **A3.** BNE objects to this interrogatory because the information sought is irrelevant. Specifically, BNE is not proposing a wind turbine having a tower shorter than 100 meters and/or rotor blades shorter than 40.3 meters in length.
- Q4. How would the use of a wind turbine having a tower shorter than 100 meters and/or rotor blades shorter than 40.3 meters in length affect ice throw?
- **A4.** BNE objects to this interrogatory because the information sought is irrelevant. Specifically, BNE is not proposing a wind turbine having a tower shorter than 100 meters and/or rotor blades shorter than 40.3 meters in length.
- Q5. How would the use of a wind turbine having a tower shorter than 100 meters and/or rotor blades shorter than 40.3 meters in length affect flicker?
- **A5.** BNE objects to this interrogatory because the information sought is irrelevant. Specifically, BNE is not proposing a wind turbine having a tower shorter than 100 meters and/or rotor blades shorter than 40.3 meters in length.
- Q6. Are there any materials or substances which are components of the wind turbines BNE proposes to use at this site, including without limitation the automatic lubrication system, which if not removed from the site at the end of the useful life of the wind turbine would reasonably be expected to affect water quality standards at the site or on adjacent properties?
 - **A6.** No.
- Q7. What do industry standards recommend concerning whether and how wind turbines should be decommissioned at the end of their useful life?
- **A7.** BNE is not aware of any industry standards that apply to decommissioning at the end of the useful life of a wind farm.
- Q8. What plans has BNE developed to "decommission" each wind turbine proposed to be used at the end of its useful life?
- **A8.** The useful life of the wind turbines are expected to be at least 20 years, but possibly 25 to 30 years. At the end of the useful life of the turbines, the wind turbines are expected to be removed and replaced with new wind turbines at that time. In the event the project is decommissioned, the wind turbines and related facilities will be removed from the surface below the natural surrounding grade and the land will be reseeded with normal forestry practices and returned as nearly as is practical to its original condition.

- Q9. What would be the cost in current dollars of each of the following tasks concerning decommissioning and site restoration for the site:
 - A. Dismantling and removing the wind turbines and their components, including without limitation all towers, nacelles, rotor blades, generators, transformers and overhead cables, if any?
 - B. Dismantling and removing all underground cables, foundations, buildings and ancillary equipment to a depth of three feet below the surface of the ground?
 - C. Dismantling and removing all surface road material?
 - D. After such dismantling and removal, the restoration of the site to substantially the same physical condition that existed immediately before construction of the wind turbine facilities?
- A9. BNE objects to this interrogatory on the basis that economic impacts, whether positive or negative, are irrelevant to this proceeding and are outside the scope of the Siting Council's jurisdiction as defined by Connecticut General Statutes §§ 16-50g and 16-50k. Subject to this objection and without waiving the same, if the Siting Council requests a decommissioning plan, BNE will discuss such plan with the Town of Colebrook prior to filing during the anticipated Development and Management phase of approval. BNE notes that the Siting Council does not require decommissioning bonds.
- Q10. What is the process and cost in current dollars of separating the steel present in the wind turbines and/or appurtenances and breaking it down into smaller sizes necessary to obtain the highest prices for scrap steel?
 - **A10.** See response to interrogatory #9.
- Q11. What is the process and cost in current dollars of removing insulation from copper present in the wind turbines and/or appurtenances and of separating other impurities from it necessary to obtain the highest prices for scrap copper?
 - **A11.** See response to interrogatory #9.
- Q12. What is the process and cost in current dollars of transporting scrap materials to scrap yards which would purchase such scrap?
 - **A12.** See response to interrogatory #9.
- Q13. What is the process and cost in current dollars of disposing of materials dismantled and/or removed from the site which have no resale value?
 - **A13.** See response to interrogatory #9.

Q14. What is the expected "significant tax revenue to the Town of Colebrook" in current dollars described on page 11 of BNE's Petition.

A14. The value of the Wind Colebrook South Project to the local community is significant and will be long lasting. Based on an estimated cost of approximately \$12 million and a 24.81 mil rate, the annual tax revenue from Wind Colebrook South to the Town will be \$213,525 and will offset a potential annual cost to the town of \$141,956 if the Property were to be developed residentially with ten dwellings. The net impact of the Project considering the tax revenue from the Project and the offset of the cost of residential development is estimated to be \$355,481 annually. According to the Town Assessor's Office, the estimated annual tax revenue of \$213,525 from the Project will make the Project the largest taxpayer on the Town's Grand List. In addition, BNE is also planning a wind project located at 29 Rock Hall Road, on the northern side of Route 44, known as Wind Colebrook North which would double the tax benefits to the Town of Colebrook. See also the informational filing submitted to the Town of Colebrook on October 8, 2010, included in the bulk filing with BNE's Petition.

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Certification

This is to certify that a copy of the foregoing has been mailed this date to all parties and intervenors of record.

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